

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al*

Debtors.¹

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of 11 U.S.C. §§ 101-1532 (as amended and applicable to the Bankruptcy Cases, the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Barnet B. Skelton, Jr. hereby enters his appearances as counsel for Red Willow Offshore, LLC in the above-captioned bankruptcy cases (the “Bankruptcy Cases”).

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002(i), 3017, and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Cases be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Barnet B. Skelton, Jr.
815 Walker, Suite 1502
Houston, Texas 77002
713-516-7450
barnetbjr@msn.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any notice, application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein.

Neither this Notice of Appearance, nor any subsequent appearance, pleading, claim, or suit, is intended to waive: (a) the rights of Red Willow Offshore, LLC to have final orders in (i) non-core matters, and (ii) matters designated for final adjudication in the Bankruptcy Court as a statutory matter pursuant to 28 U.S.C. § 157(b), but prohibited from proceeding as such pursuant to Article III of the Constitution, entered only after de novo review by a federal district court judge (and nothing contained herein shall be construed or otherwise deemed to be a waiver of such rights by Red Willow Offshore, LLC or consent by such entity to final adjudication in the Bankruptcy Court of such matters); (b) the rights of Red Willow Offshore, LLC to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (c) the rights of Red Willow Offshore, LLC to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (d) any

objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (e) an election of remedy; or (f) any other rights, claims, actions, defenses, setoffs, or recoupments to which Red Willow Offshore, LLC is or may be entitled under any agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: August 6, 2020
Houston, Texas

Respectfully submitted

/s/ Barnet B. Skelton, Jr.
Barnet B. Skelton, Jr.
State Bar. No. 18456400
815 Walker, Suite 1502
Houston, TX 77002
Telephone: (713) 516-7450
Email: barnetbjr@msn.com

Counsel to Red Willow Offshore, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2020, a true and correct copy of the foregoing has been served on all counsel and parties in interest who have consented to service via this Court's ECF filing system at the time of filing.

/s/ Barnet B. Skelton, Jr.
Barnet B. Skelton, Jr.